

EXHIBIT G

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3
4 JANE ROE, individually and on)
5 behalf of all others similarly)
6 situated,)
7)
8 Plaintiffs,)
9)
10 vs.) No. 1:12-cv-02288-JG
11) Pages 1 - 206
12 INTELLICORP RECORDS, INC., an)
13 Ohio corporation and DOES)
14 1-50, inclusive,)
15 Defendants.)
16)
17

18 **CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER**

19 VIDEOTAPED DEPOSITION OF JANE ROE

20 LOS ANGELES, CALIFORNIA

21 TUESDAY, JANUARY 22, 2013

22 REPORTED BY:
23 LESLIE L. WHITE
24 CSR NO. 4148
25 JOB NO.: 56990

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1 JANE ROE,
2 the witness herein, having been
3 first duly sworn, was examined
4 and testified as follows:
5
6

EXAMINATION

7 BY MS. CARUSO:

8 Q Good morning, [REDACTED], and thank you
9 in advance for your time today.

10 Before we get started I'd like to go
11 through a few ground rules with you.

12 I will be asking you questions today, and
13 you're required to answer my questions truthfully.

14 Okay?

15 A Okay.

16 Q From time to time your counsel may object
17 to a question, but unless he instructs you not to
18 answer my question, you're required to answer it.

19 Okay?

20 A Okay.

21 Q I think the court reporter has already
22 cautioned both of us about this, but please try to
23 use words when you answer my questions. She won't
24 be able to pick up a nod or a shrug.

25 A Okay.

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1 Exhibit 5?

2 MS. CARUSO: Yes.

3 MR. KIM: Objection. Actually, in fact, I
4 should have entered objection earlier as to
5 relevance of the information regarding the case
6 numbers ASB 06344 and case number TA 058741.

7 MS. CARUSO: Counsel, where are you pointing
8 to?

9 MR. KIM: That would be the question you had
10 asked earlier, I'm sorry, I was referring to there.
11 And the page numbers --

12 (Reporter clarification.)

13 THE WITNESS: The page numbers PLTF 000024 to
14 27 and page 28 to 30.

15 MS. CARUSO: Counsel, what is the basis for
16 your objection --

17 MR. KIM: Relevance.

18 MS. CARUSO: That's not a proper objection.

19 MR. KIM: I just want to record.

20 Not calculated to lead to reasonable
21 discovery -- or admissible evidence, rather.

22 BY MS. CARUSO:

23 Q [REDACTED], please take a look at the
24 document that I have marked as Defendants'
25 Exhibit 5.

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1 A Okay.

2 Q Let me know when you have had a chance to
3 look through it, please.

4 A Okay.

5 Q [REDACTED], these documents were
6 produced by your counsel.

7 Do you recognize them?

8 A Yes.

9 Q What do you recognize them to be?

10 A My court dockets.

11 Q For what?

12 A My criminal background.

13 Q Have you had a chance to go through to see
14 if each of the three documents within this exhibit
15 relate to each of your three arrests?

16 A Yes.

17 Q And do they?

18 A Yes.

19 Q If you please turn to the document that
20 begins at PLTF 000028. My question is whether this
21 document relates to the arrest that we were talking
22 about a moment ago on July 28th, 1998?

23 MR. KIM: Same objection, and objection as to
24 privacy.

25 ///

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1 Q Okay. We reserve our rights.

2 Do you know whether your counsel will
3 receive a portion of any recovery?

4 It's a "do you know" question.

5 A Yes.

6 Q You know that?

7 A Yes.

8 Q Ms. Hilliard, what steps have you taken to
9 remain informed of the status of this action?

10 A Just keeping in contact with my lawyers,
11 reviewing documents, and trying my best to gain an
12 understanding for all the legal terminologies and
13 the legal process in this action.

14 Q And how frequently would you say you
15 communicate with your counsel about this case?

16 A Um, it varies, communication varies,
17 depending if he needed documents from me or for me
18 to come in to review forms or signatures. So it
19 varies. Communication varies.

20 Q Over the past six months, how often would
21 you say you communicate with him?

22 A In the past six months I would say it has
23 been about probably once or twice in a month in a
24 range.

25 Q Excluding communications regarding your

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1 REPORTER'S CERTIFICATE
2 OF
3 CERTIFIED SHORTHAND REPORTER
4

5 * * * * *

6
7
8 I, THE UNDERSIGNED CERTIFIED SHORTHAND REPORTER, IN
9 AND FOR THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:
10 THAT THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME
11 AT THE TIME AND PLACE THEREIN SET FORTH, AT WHICH
12 TIME THE WITNESS WAS PUT UNDER OATH BY ME; THAT THE
13 TESTIMONY OF THE WITNESS AND ALL OBJECTIONS AT THE
14 TIME OF THE PROCEEDINGS WERE RECORDED
15 STENOGRAPHICALLY BY ME AND WERE THEREAFTER
16 TRANSCRIBED UNDER MY DIRECTION; THAT THE FOREGOING
17 IS A TRUE RECORD OF THE TESTIMONY AND OF ALL
18 OBJECTIONS MADE AT THE TIME OF THE PROCEEDINGS.
19
20

21 IN WITNESS WHEREOF, I HAVE SUBSCRIBED MY NAME ON:
22 February 1, 2013.
23

24
25

LESLIE L. WHITE, CSR NO. 4148